RTV Comment Responses

KS Wild

1. **Huff. 2016 has had no programmatic NEPA analysis at the Northwest Forest Plan scale to ensure that the purpose of the NWFP as amended (USDA and USDI 2001) would be fulfilled and provide for cooperating agency review and public review.**

The RIEC memo transmits a scientifically sound process to develop a conservation plan for RTV at the 5th field watershed scale. The MR does not authorize any actions on the ground. The conservation plan that the biologist develops on the forest for a particular 5th field watershed or watersheds is what communicates the conservation strategy. It is the project NEPA document that will apply the conservation strategy and authorize the logging. The HPS MR are an expectation for Category C and D species. RTV proactive conservation is the goal of the HPS MR.

There is no assessment of cumulative effects since the HPS MR doesn't identify specific sites or areas that would no longer be managed. One can't look into the foreseeable future and make an assumption on if this document will be used by Forests, where it will be used, and what the exact outcome will be.

2. **The Draft RTV plan fails to provide context for implementation.**

The context though is provided to some degree within the HPS MR, pages 4-11.

Given the focus on 5th field watersheds, the relevance of the previous utility of the non-HPS case-by-case determinations seems irrelevant. Instead, to use the HPS MR, one is looking at a specific 5th field watershed, providing a reasonable assurance of persistence within it, and interconnections to adjacent watersheds.

The only FS unit that has utilized the identification of non-high priority sites is the Umpqua NF and that is for the Quartz Integrated project and Calapooya Divide Integrated project (Cottage Grove RD) and Elk Creek project (Tiller RD).

Huff 2016 is the development of a high priority site conservation plan (proactive approach to species conservation) not the identification of non-high priority sites.

A 2012 memo transmitted the identification of non-high priority sites (reactive approach to species conservation). Two requests for non-high priority site designation have been made and completed and both are on the Umpqua NF (Cottage Grove RD and Tiller RD). The 2012 memo transmitted the identification of non-high priority sites.

3. **Huff. 2016 has not been revised for Forest Service use since the adoption of the BLM Southwest Oregon RMP in August 2016 which entirely eliminated all conservation requirements for the Red Tree Vole.**

For S&M species, we are to provide for a reasonable assurance of species persistence. There is no language in the January 2001 S&M ROD that directs FS to "ensure" persistence.

There is still conservation value from BLM lands, even in the new plan.

That's because Huff provided a rule set to provide a well-distributed connected population of red tree voles within the watershed, looking at what areas were already being managed consistent with RTVs, where did we need sites outside of those areas to provide good distribution, and how can we connect them all up. With less federal land managed for RTV conservation, there would likely need to be more HPS sites identified than if there was more federal land managed for RTV.

4. **Huff 2016 does not provide for Forest Service districts to write a "Red Tree Vole Conservation Plan". Similarly there are no provisions to develop "Red Tree Vole Conservation Plans" in the NW Forest Plan or the 2001 amendment to the Survey and Manage standards and guidelines (USDA and USDI 2001).**

The RTV conservation plan is synonymous with terminology used in the January 2001 S&M ROD. They are called "high priority site management recommendations". See Jan 2001 ROD, pages 10, 19 and 20 and specifically the second full paragraph on page 20.

5. **Huff 2016 does not recommend any long-term certainty for the protection of high priority sites from destructive logging.**

The intent was that these plans would be in place into the foreseeable future (10-15 years). IF the Forest should revisit the plan, they would need to continue to apply the rule set. There are multiple ways to provide RTV conservation within a watershed, and new information may result in new approaches. (Similarly, new information like larger fires, may render a need to revisit the plan as well, and that new plan may end up being more restrictive based on the altered habitat).

An amendment is not required. The use of a HPS MR is within the S&Gs as analyzed in the November 2000 FSEIS.

6. **Huff 2016:14 recommends for the establishment of high-priority sites that do not contain known red tree vole nests.**

The S&M objective is not to assure viability, but provide for a reasonable assurance of species persistence. The draft conservation plan provides sufficient rationale to document that the HPS identified with unknown occupancy have a high likelihood of occupancy, due to previous survey work in the area, and broad-scale analysis (Rosenberg).

7. **The EA fails to disclose the impact to each existing RTV High Priority Site from action alternatives implemented consistent with the Draft Red Tree Vole Conservation Plan.**

There has been no designation of sites within this watershed as High-priority sites previously (so there are no "existing RTV HPS"). This draft conservation plan is the first attempt to identify HPS. The RO will maintain spatial maps of forests that utilized the RTV HPS MR and they are finalized in a NEPA decision. The very term "high-priority" implies that some of the sites are a high-priority to maintain, while others are not. Currently all sites are managed/maintained, but that does not make them all HPS.

8. **Similar to the deficiencies in the EA, the Draft RTV Plan fails to describe the fate of 120 existing high priority red tree vole nest sites that are not included in LUA-RTV or within proposed HPS.**

"Viability" is applied at the forest scale not at the site scale. The RTV that are in logging units are not considered to be contributing to a reasonable assurance of species persistence.

9. **The Forest Service scoping letter dated May 19, 2016 failed to mention the intent to prepare a Draft Red Tree Vole Conservation Plan that would allow the logging of dozens of existing high-priority sites that currently requires ten acre no cut buffers during project layout.** The Draft RTV Plan was available on the project website, along with the Environmental Assessment.

10. The EA fails to include Siskiyou National Forest Plan amendment(s) to codify the Draft RTV Conservation Plan Briggs Creek fifth Field Watershed. The non high priority designations for an estimated 120 RTV nests is a defacto plan amendment that separately require NEPA analysis.

We already managed known sites under Survey and Manage (which is itself a plan amendment). The Draft conservation plan is just identifying where those sites are within the landscape, and documenting those land-use allocations that are being managed consistent with red tree vole conservation. This is not above and beyond the S&M S&Gs associated with the NWFP/S&M amendments to the SNFP.

The RTV plan describes actions allowed within riparian reserves. The NWFP specifically addresses the role of riparian reserves as providing for multiple species, including the red tree vole. As mentioned in Huff, this excerpt from the NWFP makes clear that we can restrict actions for this species: l (USDA and USDI 1994a: B-13):…any analysis of Riparian Reserve widths must also consider the contribution of these reserves to other, including terrestrial, species. Watershed analysis should take into account all species that were intended to be benefited by the prescribed Riparian Reserve widths. Those species include fish, mollusks, amphibians, lichens, fungi, bryophytes, vascular plants, American marten, red tree voles, bats, marbled murrelets, and northern spotted owls.

LUA-RTV is not a land allocation, or a land allocation change. It merely describes lumping those allocations that are managed consistent with RTV. All areas identified as LUA-RTV, HPS and connectivity areas are managed consistent with RTV conservation, not just areas with active nests.

If no RTV HPS MR was applied, then known sites would be receive a minimum of 10 acre buffers and managed consistent with RTV conservation

11. **The Draft Plan p. 7 states "Most early seral stands (<20 years old) within the LUA-RTV are a result of recent fires and are managed consistent with red tree vole conservation."** Correct.

12. **The EA and the Draft Red Tree Vole Conservation Plan fail to indicate how the RTV Plan would meet the EA Purpose and Need items, especially since implementation with Alternative 2 would remove substantial RTV habitat adjacent RTV nest trees in numerous Alternative 2 units.**

Implementation of the RTV Conservation Plan is not an action to meet the purpose and need of the Upper Briggs Restoration Project. It is a method of meeting the management recommendations for the Oregon red tree vole under the Northwest Forest Plan.

13. **The Draft Red Tree Vole Conservation Plan was developed with little or no documentation of field review of 1) land-use allocations managed consistent with red tree vole conservation, 2) high priority sites outside those areas, 3) connectivity areas within and between**

watersheds, and 4) non-high priority sites, including areas where pre-disturbance surveys and site management are no longer needed.

The lands set aside to be HPS may contain RTV, but are only required to contain suitable habitat for RTV life requisites. The same is true for LUA-RTV. The forest verified that through their GNN dataset and aerial imagery/interpretation and field verification that happened during site visits and wildlife surveys that have occurred over the last six years of project planning and evaluation.

14. **West of Meyers Creek there are many existing RTV nest sites in two clusters within highly resilient Douglas-fir stands on site 1 ground, however, many of these existing occupied RTV sites were not selected as HPS in the Draft RTV Plan.**
    HPS are not required to encompass all known RTV sites, but rather provide a distribution of suitable RTV habitat that will provide for a reasonable assurance of RTV persistence in the watershed. That particular area has 4 HPS covering a total of 118 acres and include 50 known sites. Twelve additional known sites are within LUA-RTV in this same area. Seventeen known sites are not within the HPS or LUA-RTV in this area and are within alternative 2 treatment units in NSO dispersal habitat. The intent of treatment in those areas is to increase development of late-successional (NRF) habitat. Project design criteria would require that the seventeen trees be retained with connective canopy to avoid isolating them. This would allow for meeting the purpose and need of the project while providing for a reasonable assurance of red tree vole persistence in the vicinity and the watershed.

15. **The Draft RTV Plan p.25 provides a coarse scale map of RTV HPS and LUA-RTV that does not illustrate known nest sites or the Upper Briggs logging units in relation to proposed HPS. Mapping is inadequate for NEPA analysis.**

    The scale of viability under NFMA is at the national forest scale not individual sites or combination of sites. Not sure this is relevant to the comment.
    The RTV Plan is independent of the proposed action and will be implemented at the scale of the Briggs Creek 5th field watershed. The known sites have been added to the RTV Plan maps (Figures 6 and 7) and maps of the RTV Plan with the Briggs Alternatives have been added to the EA.

16. **The Wildlife Report dated January 2018 has no mention of the DRAFT Red Tree Vole Conservation Plan or any analysis that was used in the Draft RTV Plan.**

The RTV Plan was mentioned on page 24 of the Wildlife Report and was available for the public to comment on, during the comment period, on the project website. It will be added as an appendix to the EA.

17. **There is no indication that the Draft Plan made adjustments to account for low frequency of RTV occurrence in the Briggs watershed.**
    Seventy-five percent of the Briggs watershed is included in Survey Areas or the RTV Plan (HPS, LUA-RTV, connectivity areas) that will be managed consistent with RTV conservation. The size and distribution of HPS and connectivity areas provide well-distributed habitat within the watershed per the ruleset in the HPS Management Recommendations (Huff 2016) for a reasonable assurance of species persistence in the watershed documented in the RTV Plan.

18. **The Draft Plan ignores the consequences of using a model that overestimates red tree vole habitat in the watershed.**

The GNN suitable habitat mapping is mapping potential RTV habitat, not occupied RTV habitat and may actually underestimate red tree vole habitat in the watershed because some known sites occur in areas mapped as non-habitat (RTV plan p 8).

19. **The Draft RTV Plan (p. 7) states: "All HPS were evaluated for conflicts with other management objectives."**

This is true, the effect of management consistent with RTV conservation on land allocation objectives was considered in the delineation of HPS and connectivity areas. Therefore, some acres within land allocations having management objectives that don't necessarily coincide with RTV conservation per the management recommendations will be constrained. This is summarized in the Wildlife Report and the EA Appendix.

20. **The Draft Red Tree Vole Conservation Plan did not provide details on red tree vole surveys and known sites within the fifth-field watershed; and failed to display the information in tabular and map form as recommended by Huff 2016.**
    The red tree vole surveys within the Briggs fifth-field watershed were described in the draft RTV Plan and are on pages 7 and 11 of the Final RTV Plan. Maps of the sites were provided to the commenter upon request during the comment period (documented in project record). The known RTV sites have been included in Figures 6 and 7 of the final RTV Plan.

21. **The EA and Draft Conservation Plan provide conflicting information about management of known red tree vole nests.**
    Check EA? We need to make sure that the management requirements within HPS, LUA-RTV and connectivity areas are stated in the EA. This may seem to be in conflict with our proposed treatments in riparian reserves. We can only commercially treat stands under 80 in the riparian reserves and would otherwise have to retain the canopy elsewhere per the RTV management recommendations – this language is at the end of the RTV Plan and in the Wildlife Report.

22. **The Draft RTV plan p.9 states that "Late-successional reserve and riparian reserves for large perennial streams are the only land allocations managed consistent with red tree vole conservation in the Briggs Creek watershed (Figure 2)."**
    That is true – standards and guidelines for management in these land allocations is consistent with RTV conservation. Smaller riparian reserves are not included in LUA-RTV because they are not considered to be large enough to support the full-life requirements of RTV.

23. **The estimated 63% reduction in number of occupied HPS in the Draft RTV Plan (p. 9; 191 sites reduced to 71 sites) would allow for logging within 300 ft of numerous known red tree vole nest sites that would significantly reduce red tree vole prey for NSO within critical NRF habitat.**

The draft RTV plan is a conservation plan for RTV and is not in the context of its predators. The Project BA evaluated the effects of the proposed action on the northern spotted owl.

Known RTV nest trees are not synonymous with high priority sites (HPS). High priority sites did not exist in the watershed prior to the draft RTV Plan. Not all HPS contain known nest trees, but they are assumed to be occupied by RTV because they contain similar suitable habitat as those HPS with known sites. The Final RTV Plan includes 98 of 169 known RTV nests trees that were not burned and still

considered as possibly extant (RTV Plan p 11). Seventy-one nest trees are not included in the RTV Plan. Many of these nest trees are in areas that would be treated to increase development of late successional habitat to benefit spotted owls and some are in areas where it is desirable to maintain pine-oak habitat within the watershed, which also benefits other prey species of northern spotted owls as well as numerous other species in the watershed. As mentioned previously, seventy-five percent of the national forest lands in the watershed will be managed consistent with RTV conservation, leaving twenty-five percent of the watershed available for habitat management for species that require other habitat types.

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8. Red Tree Vole Conservation Plan will impact viability of RTV nest sites and habitat.

The RTV Plan identifies connectivity between HPS with known and assumed nest sites, as well as land-use allocations to be managed consistent with red tree vole conservation.

The Final RTV conservation plan designates 764 acres as HPS in addition to those LUA that are managed consistent with RTV conservation plus connectivity areas. The total acres are 23,442 acres that contain 61 percent of the suitable RTV habitat on federal lands in the watershed. In addition, 13 percent of the suitable habitat in the watershed is still subject to pre-disturbance surveys and management of known sites per the RTV management recommendations. This results in 74 percent of the available suitable habitat on federal lands in the 5th field watershed that would provide for a reasonable assurance of RTV persistence in the 5th field watershed (Final RTV Plan and EA Appendix X, Table 1)

It is not the intent of the RTV HPS MR or this RTV conservation plan to create isolate, island populations or high levels of habitat fragmentation. By following the rule set in the RTV HPS MR, this 5th field watershed has habitat and lands identified that are expected to provide for a reasonable assurance of RTV persistence.

A) The proposed RTV Conservation Plan provides no assurance for long term protection of RTV nest sites and habitat.

While in the future it is true that HPS may move around on the landscape, the intent of the Plan is to provide for RTV management for the foreseeable future (10-15 years). If in the future the Plan is revisited, configuration of HPS, connectivity, and RTV-LUA will need to conform to the rule set.

B) Many currently known RTV nest sites would lose significant protections.

While true, it is expected that red tree voles exist in a large portion of the areas identified as HPS, connectivity, and RTV-LUA.

C) The RTV Conservation Plan provides no assurance that currently occupied sites will be buffered from damaging land management activities.

High-priority sites within the watershed were not previously identified until the Plan was developed; none of the sites proposed as HPS would be logged. Sites that would be logged are considered non-High Priority Sites, sites not needing to be retained in order to provide a reasonable assurance of species persistence.

Long-term viability cannot be assured. The Survey and Manage goal is based on the NFMA viability provision, but the objective of S&M is to provide for a reasonable assurance of species persistence.

D) The RTV Habitat Conservation Plan was not adequately field checked for accuracy.

GNN mapping and aerial imagery are an acceptable method of determining red tree vole habitat, based on our knowledge and understanding of what that habitat is. GNN habitat mapping and aerial imagery are important tools used by wildlife professionals that provide finer-scale accuracy, useful for larger-scale assessments. Many of the sites and GNN habitat verification has occurred on the ground by the project biologist over the last six years of project site visits and surveys.

E) Mapping in RTV Habitat Conservation Plan is inadequate.
Cite EA

F) The RTV Habitat Conservation Plan will impact a preferred prey species of the ESA listed NSO. The RTV Conservation Plan was not discussed in the Upper Briggs Restoration Project: Wildife Report & Biological Evaluation, dated January 2018.
It was mentioned on page 24 of the project Wildlife Report and Biological Evaluation. Effects to red tree voles was evaluated in the project BA for the northern spotted owl.